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September 8, 1988

Mr. Michael Towle
U.S. Environmental Protection Agency
Region III
CERCLA Remedial Enforcement Section (3 HW 12)
841 Chestnut Street, Sixth Floor
Philadelphia, Pennsylvania 19107

Dear Mr. Towle:

Re: 3 RC 22
Butler Tunnel Site


On behalf of Mr. A.B.M. Houston, Respondents' Project Coordinator,
there is transmitted herewith one copy of monthly progress report no. 16.
Your questions or comments should be directed to:

Mr. A.B.M. Houston
c/o Ford Motor Company
SSECO - Suite 608
15201 Century Drive
Dearborn, Michigan 48120

Telephone: (313) 594-0324

Very truly yours,

GANNETT FLEMING ENVIRONMENTAL ENGINEERS, INC.


A. F. MIORIN
Project Manager

cc: Mr. A.B.M. Houston (with enclosure)
PRPs and Technical Committee (with enclosure)

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GANNETT FLEMING

BUTLER MINE TUNNEL SITE

U.S. EPA Docket No. III-87-II-DC

Monthly Progress Report No. 16
For the Period
Of August 1, 1988 - September 6, 1988

Section IX, Paragraph 10 Of
Administrative Order By Consent
Effective Date Of April 29, 1987

Prepared by: Gannett Fleming
Environmental Engineers, Inc.

For: Respondents

Date: September 6, 1988

AR204917

I. Description Of Actions Taken

Heidelberg Colliery flushing project information and data in EPA's possession were reviewed with the Respondents at an August 2nd meeting in Philadelphia. The information and data covered the technical aspects of the proposed project, and DER's justification for its conclusion that the project would not have any impact on Butler Tunnel Site hydraulic conditions and water quality. Subsequent to the meeting, Respondent through direct contact with DER's Bureau of Abandoned Mine Reclamation were able to clarify certain discrepancies in the DER information.

EPA on August 19th at a meeting in Washington, DC presented to the Respondents and Department of Justice representatives a monitoring, sampling and analytical plan that it recommended be implemented prior to and during the Heidelberg Colliery flushing project. The purpose of the plan was to determine the extent to which the flushing project might be impacting on the Butler Tunnel Site. In light of DER's position that the flushing project would not have an impact on Butler Tunnel Site hydraulic conditions and water quality, DER was apparently reluctant to participate in implementing the EPA plan. The EPA representatives requested that the PRPs consider undertaking implementation of the plan, and to subsequently advise EPA of their response.

Respondents met with EPA in Philadelphia on August 31st for the purpose of presenting a scope of work they were prepared to undertake in response to EPA's request of the 19th. EPA advised Respondents at the onset of the meeting that subsequent to the 19th, several meetings between EPA and DER had resulted in both agencies agreeing to share in the implementation of a plan similar in scope to that proposed by EPA to the Respondents on August 19th. The extent of the plan was extensively reviewed and discussed. EPA requested that the Respondents identify the additional tasks that they might choose to concurrently implement, and to advise the Agency.

AR 204918

II. Information And Data Generated Or Received

Respondents continue to await notification by the Department of Justice that its file search has been completed.

III. Activities Scheduled For Next Monthly Period

In response to EPA's request made at the August 31st meeting Respondents will prepare and submit to EPA a letter identifying the tasks they propose to implement during the course of the flushing project. In view of significant changes made to the EPA monitoring, sampling and analytical plan subsequent to this meeting and the concern identified in Section IV of this report, Respondents may also request another meeting with EPA.

IV. Problems Encountered

During the course of the August 31st meeting, Respondents and the EPA Program Manager agreed that the Phase II RI/FS Work Plan currently before EPA would probably have to be revised in light of information and data to be generated as the result of the DER/EPA flushing project monitoring program. The Program Manager further stated that EPA would probably request the Respondents to execute the Administrative Order prior to completion of the flushing project. Respondents have a concern with signing the Administrative Order realizing that the current Work Plan may be subject to revision. This concern will be further addressed in the letter and/or at the meeting noted in Section III of this report.

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